

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JASON ZIMMERMAN, on behalf of himself)	
and all others similarly situated,)	Civil Action No. 7:09-cv-04602
)	
Plaintiff,)	
)	
-against-)	
)	
PORTFOLIO RECOVERY)	
ASSOCIATES, LLC,)	
)	
Defendant.)	

**DECLARATION OF SUSAN SCHNEIDERMAN IN SUPPORT OF
PLAINTIFF'S MOTION FOR ATTORNEYS' FEES**

Pursuant to 28 U.S.C. § 1746, I, Susan Schneiderman, hereby declare as follows:

1. I was an associate attorney with Lemberg & Associates, L.L.C. (the "Firm"), attorneys for the Plaintiff Jason Zimmerman ("Zimmerman"). I have personal knowledge of the information contained in this Declaration and could testify to such if called to do so. This Declaration is respectfully submitted to the Court in support of Zimmerman's motion for attorney's fees under 15 U.S.C. § 1692k.

2. I was employed by the Firm as a senior litigator. I am licensed to practice law in the Courts of New York (admitted 2/4/1985) and Connecticut (admitted 2/19/2008). I am also a member in good standing of the following Federal Bars:

- a. Supreme Court of the United States (admitted 2/28/2007)
- b. Second Circuit Court of Appeals (admitted 10/9/2007)
- c. Third Circuit Court of Appeals
- d. USDC for the Southern District of New York (admitted 2/19/1985)
- e. USDC for the Eastern District of New York (admitted 2/21/1985)

- f. USDC for the Northern District of New York
- g. USDC for the District of Connecticut
- h. USDC for the Western District of Michigan (admitted 1/4/2008)

3. I have practiced continually before the New York State Courts and the U.S. District Courts for the Southern and Eastern Districts of New York since February 1985. My entire 28+ years of law practice have focused principally upon litigation, including complex commercial litigation and litigation arising under Federal and State statutes. My usual hourly fee when billing clients an hourly rate is between \$340/hour and \$380/hour, depending upon the complexity of the work.


4. Subject to Mr. Lemberg's oversight and supervision, I was responsible for providing and overseeing certain essential litigation support in this case during the time I worked at the firm including taking the two depositions of PRA witnesses in Virginia, drafting of papers, analysis of legal issues, general oversight of junior level attorneys and paralegals and communications with my opposing counsel.

5. I have reviewed the time log submitted by the Firm in support of this motion for fees. The entries therein accurately reflect work I performed with respect to the Appeals.

6. Based upon all of the foregoing, I believe that the Firm's request for a fee award is reasonable and should be granted in all respects.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge.

Executed on May 3, 2013



Susan Schneiderman